Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	CC Docket No. 99-200
Numbering Resource Optimization	)	

SPRINT CORPORATION REPLY COMMENTS

Sprint Corporation ("Sprint"), on behalf of its local, long distance and wireless divisions, submits these reply comments in response to the comments filed in this proceeding on May 19, 2000.

I. Summary of Reply Comments

There is general agreement among the parties that *if* the Commission decides to use utilization thresholds as a condition to receiving a growth code, it must adopt a "safety valve" procedure for carriers that do not meet the threshold at the time of their application but will nonetheless exhaust if a code is not assigned promptly. If states want to assume the responsibility for processing these emergency requests, the Commission should adopt clear guidelines so these requests can be evaluated efficiently and timely.

The comments point out the fundamental problems with use of utilization thresholds as a condition to receiving a growth NXX code — most notably, they provide no guarantee that carriers most in need of additional numbers will receive them. Sprint submits for the Commission's consideration an alternative procedure that has proven successful in the states and that in Sprint's judgment, better meets the needs that state commissions have articulated in their comments.

The undisputed record evidence establishes the critical need for a brief stabilization period between CMRS LNP and pooling (similar to that given to landline carriers), to maintain network integrity and to ensure that existing services and capabilities (*e.g.*, roaming) are not adversely affected. With the other conservation measures that the Commission has adopted, a brief stabilization period will not undermine federal and state conservation efforts in any material way.

II. There Is Broad Consensus That Use of Utilization Rates Requires Adoption of a "Safety Valve" Procedure

While the role and usefulness of utilization rates are hotly debated in the comments (*see* Part III below), there is agreement among all parties that the Commission must establish a "safety value" procedure if it decides to require a certain fill rate as a condition to receiving a growth code.[1] As the Maine Commission has explained, "the FCC should allow for a waiver of the utilization rate requirement if a carrier is able to demonstrate, through a thoroughly supported Month-to-Exhaust ("MTE") worksheet, a *bona fide* need for the resources" even though it may not meet the specified threshold at the time of its application:

> For example, a wireless carrier that has traditionally experienced seasonal spikes in its numbering needs could file an MTE worksheet with detailed number utilization information from the previous year with a request for a waiver of the utilization requirement if it believed that its current numbering resources would exhaust in less than six months even though its utilization rate was currently only 50%.[2]

Sprint is not opposed in principle to the suggestion that state commissions rule on such "imminent exhaust" petitions.[3] However, as Sprint pointed out in its comments, it is

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[1] *See, e.g.*, California at 5; Maine at 3-4; New Hampshire at 6; New York at 2; Joint Consumer Counsel Advocates at 15-16; Ad Hoc Users at 5; AT&T at 5; BellSouth at 6-7; Comptel at 3-4; GTE at 3; Media-One at 5-6; SBC at 9-10; Sprint at 2-4; U S WEST at 5; Verizon at 6-8.

[2] Maine at 3-4.

[3] *See, e.g.*, Joint Consumer Counsel Advocates at 15-16.

essential that states agreeing to assume this responsibility act expeditiously: "Given the exigent circumstances that exist when a carrier exercises the 'safety value' procedures, it is imperative that the review process be conducted promptly."[4] If the Commission adopts a three-month-to-exhaust standard for its "safety valve" procedure as some have proposed,[5] states must grant or deny emergency petitions within 10 days (given the 66 days needed to activate a code). If, however, the Commission instead adopts a four or six months-to-exhaust standard, states could be afforded additional time to evaluate emergency petitions (*e.g.*, 21 or 30 days respectively).[6]

It is also imperative that the Commission establish clear assignment criteria if states want to assume the responsibility for processing emergency requests. By definition, carriers facing imminent exhaust do not have the time to wait while a state commission evaluates what criteria it should use.[7] Sprint recommended in its opening comments the assignment criteria that could be used in processing imminent exhaust requests.[8] Alternatively, the Commission could adopt the verified months-to-exhaust criteria discussed in Part III below.

If the Commission decides to use utilization rates as a condition for obtaining a growth code, it must remember that the threshold level it adopts will have direct bearing on the number of imminent exhaust petitions that carriers will be required to file. Specifically, the higher the threshold, the more likely that carriers will find themselves in the situation

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[4] Sprint at 4. Carriers will submit "imminent exhaust" petitions only if they are facing imminent exhaust. It is therefore essential that states act on such petitions promptly. In this instance, relief delayed will generally mean relief denied.

[5] *See, e.g.*, California at 5.

[6] The Commission should confirm that it will promptly entertain appeals of state decisions denying an emergency petition or when a state does not act within the specified time period.

[7] As the Commission is aware, Sprint PCS is currently facing this very predicament in connection with its emergency petition pending before the California Commission.

[8] *See* Sprint at 4.

having to seek emergency relief.[9] Emergency petitions can be time consuming for carriers to prepare and for regulators to review,[10] and efficiency considerations dictate that the Commission establish a growth code assignment procedure so that the need for emergency petitions would be rare. No one benefits if carriers and regulators must spend hours addressing the assignment of a single NXX code.

III. A Proposed Alternate to Use of Utilization Thresholds for the Assignment of Growth Codes

Sprint is not opposed to consideration of utilization, or fill, rates in determining a carrier's entitlement to a growth code (so long as there is a "safety valve" procedure).[11] However, as the commenters point out, there are also many fundamental problems with fill rates — most notably, they provide no guarantee whatever that carriers most in need of additional numbers will receive them. Consider the following:

1. A carrier meeting the fill rate would be eligible for additional numbers even when it may have no need for additional numbers.

   For example, Verizon Wireless has 25 NXX codes in the Boston rate center (617 NPA). Even if the Commission were to establish a fill rate of 90%, Verizon would be eligible to receive an additional (26th) code when it has up to 25,000 numbers available for assignment — the equivalent of 2.5 entire NXX codes.

2. Fill rates can discriminate against new entrants and in favor of incumbent carriers.[12]

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[9] *See, e.g.*, AT&T at 6-7; BellSouth at 5.

[10] The Commission has had some experience with such petitions. *See Sprint PCS Request for Emergency Relief in the 516 NPA,* NSD File No. 99-25, DA 99-505, 14 FCC Rcd 3972 (March 12, 1999).

[11] With near unanimity, states favor adoption of a 75% fill rate. *See, e.g.,* California 3-5; Maine at 4; New Hampshire at 6; New York at 1-2; Pennsylvania 3-4. While Sprint agrees that a 75% fill rate has been reasonably successful in some states, these states have measured utilization differently from what the FCC proposes. As carriers have uniformly documented, a 75%-80% fill rate is not reasonably achievable under the FCC's proposed formula. *See, e.g.,* AT&T at 6; Bell Atlantic at 8; BellSouth at 4-5; MediaOne at 4; Nextel at 3-4; SBC at 10-11; Verizon at 21-23.

[12] *See, e.g.,* Cox at 3 ("[A]ny numeric thresholds inherently will favor incumbents over new entrants."); VoiceStream at 7-8; GSA at 4.

Sprint PCS has one NXX code in the Boston rate center.[13] With a 75% fill rate requirement, Sprint PCS would be eligible to apply for a second code when it has less than 2,500 numbers available for assignment (actually, much less under the Commission's proposed formula). In contrast, under the same standard, Verizon Wireless would be eligible to apply for and receive its 26th code even though it may have over 62,000 numbers available for assignment — the equivalent of over six NXX codes. Although Sprint PCS is growing as fast (if not faster) than Verizon Wireless, a fill rate requirement could preclude it from continuing to provide its services when one of its competitors may have abundant numbering resources.

3. A fast growing carrier may have a critical need for additional numbers even though it does not meet the specified fill rate at the time of its application, the time of which is dictated by the 66-day number activation process.

   The commenters are in agreement that the Commission must adopt a "safety valve" procedure regardless of the specific fill rate that it may establish. Sprint PCS, a rapidly growing carrier, finds it increasingly necessary to invoke these procedures.

The core problem with considering fill rates in determining a carrier's eligibility to receive a growth code is that they to not consider the most critical issue in the growth code assignment equation: a carrier's immediate or near-term need for additional telephone numbers. As GSA has stated, "[f]ill percentages have limited value because they look to the past. While fill rates may accurately describe the historical need at a particular location, they have no necessary relationship to future demands."[14]

[13] Curiously, NextWave, whose licenses have been rescinded, holds two NXX codes in the Boston rate center (617-419 and 617-518).

[14] GSA at 4-5. *See also* Nextel at 3 ("A carrier's utilization of existing telephone numbers does not provide an accurate forecast of future numbering needs."); PCIA at 3-4 ("A carrier's utilization rate is not a direct proxy for that carrier's need for additional numbering resources."); GSA at 4 ("[F]ill rates depend more significantly upon the types of areas that the carrier serves and the length of time that the carrier has been providing service than upon how efficiently the carrier uses numbering resources.").

The specific utilization rate formula that the Commission has proposed is especially problematic, and may result in undesirable consequences.[15] Consider the following:

- High fill rates may have the unintended effect of encouraging carriers to obtain additional, separate codes for special services (*e.g.*, calling party pays, prepaid, and reverse billing) — codes they may not have otherwise needed.[16]

  For example, prepaid services require different processing than ordinary "post billed" services, and carriers use telephone numbers to ensure calls are processed properly. Cellular carriers historically provided their prepaid services using separate NXX codes. Sprint PCS and other carriers instead support their prepaid services using a block of numbers within their "ordinary" codes. The latter practice can be more efficient than use of separate codes. Nonetheless, if the fill rate is set too high, carriers using this practice may be compelled to begin ordering separate codes for their special services so they are not placed at a competitive disadvantage in obtaining timely additional codes.

- The proposed fill rate equation will discourage facility-based carriers from promoting the resale of their services.[17]

  Under the current proposal, numbers that a carrier sets aside for resellers are treated as if they were available to the carrier when, in fact, they are not. The more numbers that a carrier sets aside for resale, the more difficult it becomes for that carrier to obtain an additional code to meet the needs of its own customers. The current proposal thus penalizes carriers interested in promoting the resale of its services.

Given these rather fundamental problems with fill rates, the Commission should consider whether there is a better, more effective approach in determining when a carrier should be entitled to receive a growth code. Based on the experience in several states (*e.g.*, Illinois, New York), Sprint PCS submits that there is a superior method for assigning growth codes: a *verified* months-to-exhaust procedure, whereby a carrier would be entitled to receive a

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[15] In addition, because the proposed formula grossly overstates the quantity of numbers actually available for assignment to customers, the public will be given the erroneous impression that carriers are less efficient than they actually are. *See, e.g.*, SBC at 7-8.

[16] *See, e.g.*, GTE at 4-5; Verizon at 15-16.

[17] *See, e.g.*, Verizon at 18-20.

code (regardless of its utilization rate) only upon documenting its need based on rate center-specific historical assignment rates and forecast data.

The purpose of efficient number administration is to ensure that carriers "obtain numbering resources when and where they are needed to provide service."[18] The goal of ensuring that carriers receive needed numbers timely is best achieved through a *verified* months-to-exhaust procedure because such a procedure focuses on each carrier's need for numbers.[19]

Sprint recommends that the Commission adopt the following procedure instead of using utilization rates coupled with a "safety value" procedure:

- A carrier may apply for a code when it projects exhaust of its existing supply of numbers within six months (four months if the NPA is in jeopardy).[20]
- A carrier will be entitled to receive a growth code automatically if it demonstrates that projected demand is within 15% of historical assignments over the past six months.
- A carrier forecasting demand higher than 15% of historical, must make a special demonstration justifying its projected demand (*e.g.*, assignment rate during the last busy season, a new large account); and

[18] Optimization Order at ¶ 103.

[19] Sprint agrees with Maine Commission that the past practice of permitting carriers to obtain additional codes based on undocumented forecasts is no longer workable. *See* Maine at 2.

[20] Sprint is not opposed to a three-month standard if a NPA is in jeopardy, but a shorter MTE date means that NANPA or a state commission must act more expeditiously on the request.

- State commissions may review and approve petitions where projected demand exceeds 15%. NANPA will consider such applications when a state commission has no desire to assume this responsibility.[21]

Sprint submits that this proposed *verified* month-to-exhaust procedure is competitively neutral and ensures far better than a fill rate procedure that only those carriers in need of additional numbers receive them.

IV. Record Evidence Establishes the Critical Need for a Brief Stabilization Period Between CMRS LNP and Pooling

Some commenters contend that CMRS providers should implement pooling simultaneously with LNP because it is technically feasible to do both concurrently and because CMRS providers will have had ample notice of their pooling obligation.[22] Sprint does not dispute either point, but these commenters overlook the reason why the CMRS industry needs some time between LNP cutover and pooling implementation. Given the complexity of wireless LNP, CMRS providers need a minimum of six months (preferably 9-12 months) before undertaking the additional complexity associated with pooling in order to stabilize their networks and to ensure that roaming continues to work properly.

Wireless LNP, as SBC has noted correctly, will represent "the largest, most extensive and ubiquitous upgrade to existing networks in the history of telephony."[23] CMRS pro-

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[21] Fill rates do not address assignment of initial codes, and the assignment of initial codes is a primary driver of area code exhaust. Without some restraint on the assignment of initial codes, carriers would have an incentive to seek NXXs in every rate center. The Commission should require initial code applicants to demonstrate: (1) they are authorized to provide service in the area or have an application pending for such authorization which is expected to be approved within nine months; (2) they are interconnected and have sufficient operable facilities in the rate center requested within nine months (four months if the NPA is in jeopardy); and (3) within thirty days following the nine month period (four, if jeopardy) the applicant must certify that interconnection is in place and that it has begun to use the code in the provision of service to the customer. Initial codes should be reclaimed if the carrier fails to submit the certification in part (3).

[22] *See, e.g.,* Ad Hoc Users at 6-8; California at 6-9; GSA at 6-8; New Hampshire at 7-8; Pennsylvania at 6-8.

[23] SBC at 12.

viders must undertake the same modifications as LECs, *plus* they face the added complexity of the MIN/MDN separation *plus* they must "flash cut" their LNP implementation.[24] Thus, although facing a far more daunting task than LECs, CMRS providers will not have the luxury LECs enjoyed in implementing their LNP over time. The CMRS industry seeks only six-to-12 months following their more complex LNP cutover so they have some time to stabilize their networks and ensure that roaming is not negatively impacted.[25] As AT&T notes, CMRS carriers need time "to ensure that [pooling] deployment is not plagued by service failures that could have been avoided with proper testing and resolution of issues raised by LNP implementation":

> Failure to provide a transition period to ensure that LNP is functioning properly on a nationwide basis could result in major service disruptions to the detriment of both wireline and wireless subscribers.[26]

Importantly, a brief stabilization period will not have a major impact on the Commission's number conservation objectives. The Commission is adopting new rules to ensure that NXX codes are assigned only to carriers in need of additional telephone numbers. In addition, upon receiving a NXX code, CMRS providers are also now required to manage their numbers in blocks of 1,000 in order to "protect clean thousands blocks from unnecessary contamination."[27] Given these new rules, it makes little difference as a practical matter whether CMRS pooling begins on the date of LNP activation or some months later.

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[24] The current wireless LNP implementation date is set for the middle of the holiday season (Nov. 24, 2002). The Commission should therefore postpone this date by two months (to Jan. 24, 2002) to ensure that the roaming capabilities of holiday travelers are not negatively impacted.

[25] *See* AT&T at 8-10 (six month stabilization period); BellSouth at 9-12 (12 months); Nextel at 5-7 (six months); SBC at 12-13 (nine months); Sprint at 10-13 (six months); U S WEST at 5-6 (12 months); Verizon at 23-24 (nine months); VoiceStream at 13-16 (eight months).

[26] AT&T at 9-10. Moreover, implementing both capabilities concurrently would greatly complicate trouble shooting because there may be circumstances where the problem cannot be easily isolated to LNP or pooling.

[27] *Optimization Order* at ¶ 244.

The CMRS industry is not seeking "special treatment" as one commenter suggests.[28] CMRS providers do seek a stabilization period following their LNP implementation. But the stabilization period they seek is far shorter than the stabilization period that the Commission extended to LECs. Such a stabilization period is especially important because once CMRS providers are pooling ready, they must be prepared to implement pooling on a more aggressive schedule than LECs so they can catch up to LECs.

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[28] *See* Ad Hoc Users at 7. Ad Hoc misstates the record in asserting that the Massachusetts DTE did not implement pooling because of the inability of CMRS providers to pool. *See id.* at 6 n.9. Rather, the DTE did not implement pooling because there was an insufficient supply of codes available to meet the demand forecasted by *all* carriers. "Because there is not a sufficient supply of thousands-blocks and full exchange codes to meet demand, the conclusion . . . is also inescapable: TNP also cannot solve the numbering problems for wireline carriers." *DTE Area Code Order,* Dockets D.T.E. 99-11/99-99 (April 25, 2000).

CERTIFICATE OF SERVICE

I, Anthony Traini, hereby certify on that on this 9th day of June 2000, I served a copy of the foregoing Sprint reply comments by U.S. first-class mail, or by hand delivery as indicated with an *, to the following persons:

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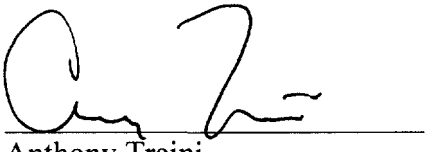

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